

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
Atlanta Division**

D. H. PACE COMPANY, INC.,

Plaintiff,

v.

MATTHEW JOHNSON and LIBERTY
GARAGE DOOR SERVICES, LLC,

Defendants.

Civil Action No.1:22-CV-01005-
SEG

SUPPLEMENT TO ESI PROTOCOL

WHEREAS, Plaintiff D.H. Pace Company, Inc. (“DH Pace”), Defendant Matthew Johnson, and Defendant Liberty Garage Door Services, LLC (“Liberty”) (each a “Party” and collectively, the “Parties”) are engaged in litigation in the above-captioned matter.

WHEREAS, the Parties wish to supplement the ESI Protocol to which they agreed on May 27, 2022, to broaden the search of documents to include those responsive to Plaintiff’s discovery requests.

A. Supplement to ESI Protocol

1. The forensic investigator shall conduct searches of the Defendants' Company Devices, Personal Devices, email accounts, and social media (including, but not limited to, for example only, FaceBook, Yelp, HomeAdvisor, Google, Angie's List), relevant to Plaintiff's discovery requests and/or this litigation. The forensic investigator shall conduct these searches using search criteria (including, but not limited to, keywords) mutually agreed upon by the Parties.
2. After running searches using the search criteria supplied by the Parties, the forensic investigator shall report to the Parties the gross number of documents identified under each search. Any terms yielding an unreasonably high number of results will be refined by the Parties.
3. After a mutually agreed search criteria has been determine, the investigator will gather the documents and other information electronically and provide them to counsel for Defendants.
4. After receiving the documents and any other information discussed in the preceding paragraph, Defendants' counsel shall review the gathered documents and other information for responsiveness, attorney-client privilege and/or attorney work product.

5. Defendants' counsel shall then produce all responsive, non-privileged documents, along with an adequate privilege log, on or before July 1, 2022. However, under no circumstance shall Defendants' counsel have less than 24 hours to review and produce documents.
6. Except as supplemented herein, the terms and conditions of the original ESI Protocol shall remain unchanged and in full force and effect. Nothing in this Supplement shall affect the validity and/or enforceability of the original ESI Protocol, except as modified herein.

FELLOWS LABRIOLA LLP

/s/ Stephen T. LaBriola
Stephen T. LaBriola
Georgia Bar No. 431026
Ethan M. Knott
Georgia Bar No. 737481
Suite 2400 Harris Tower
233 Peachtree Street, NE
Atlanta, GA 30303
(404) 586-9200
slabriola@fellab.com
eknott@fellab.com

*Attorneys for Plaintiff D. H. Pace Company,
Inc.*

**HALL, GILLIGAN, ROBERTS &
SHANLEVER, LLP**

s/Wayne M. Cartwright

David A. Roberts

Georgia Bar No. 608444

droberts@hgrslaw.com

Brian S. Abrams

Georgia Bar No. 611649

babrams@hgrslaw.com

Wayne M. Cartwright

Georgia Bar No. 257328

wcartwright@hgrslaw.com

3340 Peachtree Road, N.E.

Suite 1900

Atlanta, Georgia 30326-1082

T: (404) 247-0994

F: (404) 537-5555

Attorneys for Defendants